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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20054

VIA HAND DELIVERY

Re: GN Docket No. 96-228; Establishment of a Wireless Communications Service in the 2.3 GHz Band
EX PARTE MEETING

Dear Mr. Caton:

The purpose of this letter is to provide notice that, earlier today, Melvin Lassere, Telecommunications Manager of Shell Offshore Services Company ("SOSCo"), meet with Julius Genachowski of Chairman Hundt's office to discuss the above-captioned proceeding. Wayne V. Black and Brian Turner Ashby, telecommunications counsel to SOSCo, also were present at the meeting.

The discussion concerned the need to include the Gulf of Mexico in the upcoming auction of Wireless Communications Service spectrum in the 2305-2320 MHz and 2345-2360 MHz bands. The issues discussed at the meeting are summarized in the attached position paper that was made available during the meeting.

Should further information be required, please contact the undersigned.

Cordially yours,

Brian Turner Ashby

Enclosure

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SHELL OFFSHORE SERVICES COMPANY
ESTABLISHMENT OF A WIRELESS COMMUNICATIONS SERVICE AT 2.3 GHz
GN DOCKET NO. 96-228

- As deepwater production platforms are deployed in the GOM, experts predict that the GOM will become the largest oil and natural gas frontier in the U.S. This oil and natural gas is critical to the nation's economy and will decrease dependence on foreign sources.

- Deepwater exploration and production activity in the GOM has led to an increase in the demand for wireless telecommunications services in the GOM. Service providers, however, are having difficulty meeting this demand:

  - Certain requirements unique to the GOM cannot be met using existing spectrum allocations. For instance, reliable, point-to-point microwave links are not possible at deepwater production platforms using spectrum above 2 GHz. No spectrum is available at or below 2 GHz on a primary basis.

  - There is a dearth of spectrum available because the GOM has not been included in recent spectrum auctions. Currently, it is not possible to obtain PCS, MDS, or SMR licenses in the GOM.

- The Commission should allocate the 2.3 GHz band for a WCS in the GOM to help meet the growing need for wireless telecommunications services. As long as all of the prerequisites for an auction are present, including mutual exclusivity, this spectrum should be auctioned.

- The Commission should issue a single license for the entire GOM. The GOM is a unique environment that is distinct from onshore locations. In previous auctions, unique locations such as American Samoa and the Northern Mariana Islands were treated as distinct geographic areas for licensing purposes.

- The Commission should issue a single license for all 30 MHz of spectrum slated for allocation to the WCS. If the spectrum were to be divided among one or more WCS licensees, there would be insufficient spectrum to provide the sorts of services, such as Internet access and videoconferencing, needed by the businesses that populate the GOM.

- The GOM should be defined in the same way that it was for purposes of cellular licensing. The Commission clearly has jurisdiction to issue licenses in the GOM because thousands of cellular, SMR, microwave, and private land mobile licenses already have been issued for GOM operations.